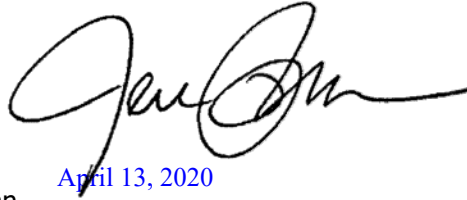


# Morgan Lewis

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Application GRANTED. Defendant's deadline to respond to the Complaint is EXTENDED to June 12, 2020; the initial pretrial conference is ADJOURNED to July 7, 2020, at 3:00 p.m. (the mediation deadline is correspondingly adjourned). The Clerk of Court is directed to terminate ECF No. 10. SO ORDERED.



April 12, 2020

**Via ECF**

The Honorable Jesse M. Furman  
United States District Court  
For the Southern District of New York  
40 Foley Square  
New York, NY 10007

April 13, 2020

**Re: Cruz v. VF Outdoor, No. 1:20-cv-1253-JMF**  
**Request to Extend Defendant's Time to Respond to Complaint**

Dear Judge Furman:

We represent defendant VF Outdoor, Inc. ("Defendant") in the above-referenced action. Pursuant to Rules 1(A) and 1(E) of Your Honor's Individual Rules and Practices in Civil Cases, we write with the consent of counsel for plaintiff Shael Cruz ("Plaintiff"), respectfully to request that the Court (a) extend Defendant's time to respond to the Complaint to from April 13, 2020 to June 12, 2020; (b) adjourn the initial conference scheduled for May 19, 2020 at 3:00 p.m. to a date and time after the extended response deadline that is convenient to the Court; and (c) extend the parties' time to comply with the Court's mediation referral in accordance with the adjourned-to Initial Conference date. This is Defendant's first request for an extension of time to respond to the Complaint and to adjourn the Initial Conference.

In support of these requests, counsel for Defendant states that the parties are engaged in discussions about a possible early resolution of this matter. If granted, this extension of time will permit the parties to focus on those discussions, rather than on pleadings and litigation. Further, because of the ongoing COVID-19 pandemic, counsel for Defendant submits that good cause exists to adjourn the Initial Conference and extend the parties time to engage in formal, in-person mediation. As noted above, Plaintiff's counsel consents to this request. If granted, this extension will not affect any other date scheduled in this action.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

/s/ Michael F. Fleming

Michael F. Fleming

*Attorney for Defendant*

cc: All Counsel of Record (via ECF)

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